

1 Brian E. Klein (Bar No. 258486)
2 bklein@waymakerlaw.com
3 Scott M. Malzahn (Bar No. 229204)
4 smalzahn@waymakerlaw.com
5 Donald R. Pepperman (Bar No. 109809)
6 dpepperman@waymakerlaw.com
7 Kevin M. Casey (Bar No. 338924)
8 kcasey@waymakerlaw.com
WAYMAKER LLP
515 S. Flower Street, Suite 3500
Los Angeles, California 90071
Telephone: (424) 652-7800
Facsimile: (424) 652-7850

Attorneys for Defendants Multicoin Capital Management LLC and Kyle Samani

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all others similarly situated,

Plaintiff,

V.

SOLANA LABS, INC.;
THE SOLANA FOUNDATION;
ANATOLY YAKOVENKO; MULTICOIN
CAPITAL MANAGEMENT LLC; KYLE
SAMANI; and FALCONX LLC.

Defendants.

Case No. 3:22-cv-03912-RFL

**DEFENDANTS MULTICOIN CAPITAL
MANAGEMENT LLC AND KYLE
SAMANI'S UNOPPOSED
ADMINISTRATIVE MOTION TO
EXTEND PAGE LIMITS PURSUANT TO
STIPULATION**

Judge: Rita F. Lin

1 Pursuant Civil Local Rules 7-11 and 7-12 and the Court's Standing Order, defendants
2 Multicoin Capital Management LLC ("Multicoin"), and Kyle Samani ("Samani") (together, the
3 "Multicoin Defendants"), respectfully submit this unopposed administrative motion seeking an
4 order to extend page limits. Specifically, the Multicoin Defendants seek an order pursuant to the
5 concurrently submitted Joint Stipulation with defendant Solana Labs, Inc. ("Solana Labs," and
6 together with the Multicoin Defendants, "Defendants") and Lead Plaintiff Mark Young
7 ("Plaintiff," and together with Defendants, the "Parties") agreeing to extend page limits in
8 connection with the Parties' briefing on motions to dismiss Plaintiff's Consolidated Amended
9 Class Action Complaint (the "CAC").

10 This motion requests permission to exceed the 15-page limit set by the Court's Standing
11 Order and seeks leave for Defendants to file five (5) additional pages in Defendants' briefs in
12 support of their motions to dismiss and in Plaintiff's anticipated opposition, as agreed by the
13 Parties pursuant to the Joint Stipulation. Accordingly, the Parties request leave for Defendants to
14 file 20-page briefs in support of motion to dismiss and for the Plaintiff to file 20-page briefs in
15 support of his opposition to Defendants' motions to dismiss.

16 Given the complexity and number of issues the Parties intend to address in their respective
17 motions to dismiss and opposition, the Parties agree that an additional five pages is needed to fully
18 address such issues. The CAC alleges violations of state and federal securities laws in connection
19 with Plaintiff's alleged purchases of SOL cryptocurrency tokens and makes numerous factual and
20 class allegations regarding the underlying technology in support of his claims. Permitting the
21 Parties to submit 20-page briefs will allow a more complete briefing of the complex issues and is
22 in accord with the Court's "broad authority to manage complex litigation." *Plata v. Brown*, 754
23 F.3d 1070, 1077 (9th Cir. 2014) (citing Fed. R. Civ. P. 16; *United States v. W.R. Grace*, 526 F.3d
24 499, 509 (9th Cir. 2008)).

25 For these reasons, the Multicoin Defendant respectfully move this Court pursuant to L.R.
26 7-11 and 7-12 to enter the concurrently submitted Joint Stipulation and permit the Parties to file
27 five (5) additional pages in their respective briefs in connection with the Defendants' motion to
28 dismiss the CAC.

1
2
3 DATED: April 2, 2024

WAYMAKER LLP

4
5 By: /s/ Kevin M. Casey
6 Brian E. Klein (Bar No. 258486)
7 bklein@waymakerlaw.com
8 Scott M. Malzahn (Bar No. 229204)
9 smalzahn@waymakerlaw.com
10 Donald R. Pepperman (Bar No. 109809)
11 dpepperman@waymakerlaw.com
12 Kevin M. Casey (Bar No. 338924)
13 kcasey@waymakerlaw.com

14
15 515 S. Flower Street, Suite 3500
16 Los Angeles, California 90071
17 (424) 652-7800

18
19 *Attorneys for Defendants Multicoin Capital*
20 *Management LLC and Kyle Samani*



21
22
23
24
25
26
27
28